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**BEFORE THE  
BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA**

In the Matter of the Accusation Against:

Case No. VN-2009-5167

**FRANCISCA CASTRO  
8933 Biscayne Court, #223C  
Huntington Beach, CA 92646-6202**

**DEFAULT DECISION AND ORDER**

**Vocational Nurse License No. VN 123517**

[Gov. Code, §11520]

Respondent.

**FINDINGS OF FACT**

1. On or about April 8, 2011, Complainant Teresa Bello-Jones, J.D., M.S.N., R.N., in her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric Technicians, Department of Consumer Affairs, filed Accusation No. VN-2009-5167 against Francisca Castro (Respondent) before the Board of Vocational Nursing and Psychiatric Technicians. (Accusation attached as Exhibit A.)

2. On or about September 19, 1984, the Board of Vocational Nursing and Psychiatric Technicians (Board) issued Vocational Nurse License No. VN 123517 to Respondent. The Vocational Nurse License expired on August 31, 2010, and has not been renewed.

3. On or about April 8, 2011, Respondent was served by Certified and First Class Mail copies of the Accusation No. VN-2009-5167, Statement to Respondent, Notice of Defense, Request for Discovery, and Discovery Statutes (Government Code sections 11507.5, 11507.6, and 11507.7) at Respondent's address of record which, pursuant to Business and Professions Code section 136 and California Code of Regulations, title 16, section 2504, is required to be reported and maintained with the Board, which was and is:

1 8933 Biscayne Court, #223C  
2 Huntington Beach, CA 92646-6202

3 4. Service of the Accusation was effective as a matter of law under the provisions of  
4 Government Code section 11505, subdivision (c) and/or Business & Professions Code section  
5 124.

6 5. On or about April 11, 2011, the aforementioned documents were delivered to  
7 Respondent's address of record by the U.S. Postal Service.

8 6. Government Code section 11506 states, in pertinent part:

9 (c) The respondent shall be entitled to a hearing on the merits if the respondent  
10 files a notice of defense, and the notice shall be deemed a specific denial of all parts  
11 of the accusation not expressly admitted. Failure to file a notice of defense shall  
12 constitute a waiver of respondent's right to a hearing, but the agency in its discretion  
13 may nevertheless grant a hearing.

14 7. Respondent failed to file a Notice of Defense within 15 days after service upon her of  
15 the Accusation, and therefore waived her right to a hearing on the merits of Accusation No. VN-  
16 2009-5167.

17 8. California Government Code section 11520 states, in pertinent part:

18 (a) If the respondent either fails to file a notice of defense or to appear at the  
19 hearing, the agency may take action based upon the respondent's express admissions  
20 or upon other evidence and affidavits may be used as evidence without any notice to  
21 respondent.

22 9. Pursuant to its authority under Government Code section 11520, the Board finds  
23 Respondent is in default. The Board will take action without further hearing and, based on the  
24 relevant evidence contained in the Default Decision Evidence Packet in this matter, as well as  
25 taking official notice of all the investigatory reports, exhibits and statements contained therein on  
26 file at the Board's offices regarding the allegations contained in Accusation No. VN-2009-5167,  
27 finds that the charges and allegations in Accusation No. VN-2009-5167, are separately and  
28 severally, found to be true and correct by clear and convincing evidence.

10 Taking official notice of its own internal records, pursuant to Business and  
11 Professions Code section 125.3, it is hereby determined that the reasonable costs for Investigation  
12 and Enforcement is \$732.50 as of May 9, 2011.

## DETERMINATION OF ISSUES

1. Based on the foregoing findings of fact, Respondent Francisca Castro has subjected her Vocational Nurse License No. VN 123517 to discipline.

2. The agency has jurisdiction to adjudicate this case by default.

3. The Board of Vocational Nursing and Psychiatric Technicians is authorized to revoke Respondent's Vocational Nurse License based upon the following violations alleged in the Accusation which are supported by the Default Decision Investigatory Evidence Packet in this case:

a. Respondent has subjected her license to disciplinary action under sections 490 and 2878, subdivision (f) of the Code in that on or about August 22, 2007, in a criminal proceeding entitled *People of the State of California v. Francisca Rebecca Castro*, in Los Angeles County Superior Court, case number 5AL02991, Respondent was convicted on her plea of nolo contendere of violating Vehicle Code section 23152, subdivision (b), driving with a blood alcohol content (BAC) of 0.08 percent or higher, a misdemeanor; and Vehicle Code section 14601.1, subdivision (a), driving on a revoked driver's license, crimes that are substantially related to the qualifications, functions, and duties of a licensed vocational nurse.

b. Respondent has subjected her license to disciplinary action under section 2878.5, subdivision (b) of the Code for unprofessional conduct in that on or about July 1, 2005, Respondent used alcohol in a manner dangerous or injurious to herself and others, in that she operated a motor vehicle on a public roadway while intoxicated.

c. Respondent has subjected her license to disciplinary action under section 2878.5, subdivision (c) of the Code for unprofessional conduct in that on or about August 22, 2007, Respondent was convicted of an alcohol-related crime.

d. Respondent has subjected her license to disciplinary action under sections 490 and 2878, subdivision (f) of the Code in that on or about August 16, 2007, in a criminal proceeding entitled *People of the State of California v. Francisca Rebecca Castro*, in Los Angeles County Superior Court, case number 6EA10080, Respondent was convicted on her plea

///

1 of nolo contendere of violating Penal Code section 242, battery, a misdemeanor, a crime that is  
2 substantially related to the qualifications, functions, and duties of a licensed vocational nurse.

3 e. Respondent has subjected her license to disciplinary action under sections 490  
4 and 2878, subdivision (f) of the Code in that on or about August 16, 2007, in a criminal  
5 proceeding entitled *People of the State of California v. Francisca Rebecca Castro*, in Los  
6 Angeles County Superior Court, case number 7EA05853, Respondent was convicted on her plea  
7 of nolo contendere of violating Penal Code section 166, subdivision (a)(4), willful disobedience  
8 of a court order, a crime that is substantially related to the qualifications, functions, and duties of  
9 a licensed vocational nurse.

10 f. Respondent has subjected her license to disciplinary action under section 2878,  
11 subdivisions (e) and (j), in that on or about May 6, 2010, Respondent made a false statement of  
12 fact required to be revealed in her renewal application to the Board when she failed to disclose  
13 her August 22, 2007, criminal conviction for driving under the influence; her August 16, 2007,  
14 criminal conviction for battery; and her August 16, 2007, criminal conviction for violating a  
15 restraining order.

16 **ORDER**

17 IT IS SO ORDERED that Vocational Nurse License No. VN 123517, heretofore issued to  
18 Respondent Francisca Castro, is revoked.

19 Pursuant to Government Code section 11520, subdivision (c), Respondent may serve a  
20 written motion requesting that the Decision be vacated and stating the grounds relied on within  
21 seven (7) days after service of the Decision on Respondent. The agency in its discretion may  
22 vacate the Decision and grant a hearing on a showing of good cause, as defined in the statute.

23 This Decision shall become effective on August 28, 2011.

24 It is so ORDERED July 29, 2011

25   
26 FOR THE BOARD OF VOCATIONAL NURSING  
27 AND PSYCHIATRIC TECHNICIANS  
28 DEPARTMENT OF CONSUMER AFFAIRS

DOJ Matter ID:SD2011700369

Attachment: Exhibit A: Accusation

# Exhibit A

Accusation

FILED

APR 01 2011

Board of Vocational Nursing  
and Psychiatric Technicians

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9  
10 **BEFORE THE**  
**BOARD OF VOCATIONAL NURSING AND PSYCHIATRIC TECHNICIANS**  
**DEPARTMENT OF CONSUMER AFFAIRS**  
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. VN-2009-5167

13 **FRANCISCA CASTRO**  
8933 Biscayne Court, #223C  
14 Huntington Beach, CA 92646-6202

**A C C U S A T I O N**

15 **Vocational Nurse License No. VN 123517**

16 Respondent.

17  
18 Complainant alleges:

19 **PARTIES**

20 1. Teresa Bello-Jones, J.D., M.S.N., R.N. (Complainant) brings this Accusation solely in  
21 her official capacity as the Executive Officer of the Board of Vocational Nursing and Psychiatric  
22 Technicians, Department of Consumer Affairs.

23 2. On or about September 19, 1984, the Board of Vocational Nursing and Psychiatric  
24 Technicians issued Vocational Nurse License Number VN 123517 to Francisca Castro  
25 (Respondent). The Vocational Nurse License expired on August 31, 2010, and has not been  
26 renewed.

27 ///

28 ///

## JURISDICTION

3. This Accusation is brought before the Board of Vocational Nursing and Psychiatric Technicians (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code (Code) unless otherwise indicated.

4. Section 118, subdivision (b) of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated. Under section 2892.1 of the Code, the Board may renew an expired license at any time within four years after the expiration.

5. Section 2875 of the Code provides, in pertinent part, that the Board may discipline the holder of a vocational nurse license for any reason provided in Article 3 (commencing with section 2875) of the Vocational Nursing Practice Act.

## STATUTORY PROVISIONS

6. Section 482 of the Code states:

Each board under the provisions of this code shall develop criteria to evaluate the rehabilitation of a person when:

(a) Considering the denial of a license by the board under Section 480; or

(b) Considering suspension or revocation of a license under Section 490.

Each board shall take into account all competent evidence of rehabilitation furnished by the applicant or licensee.

7. Section 490 of the Code provides, in pertinent part, that the Board may suspend or revoke a license when it finds that the licensee has been convicted of a crime substantially related to the qualifications, functions or duties of a licensed vocational nurse.

8. Section 493 of the Code states:

Notwithstanding any other provision of law, in a proceeding conducted by a board within the department pursuant to law to deny an application for a license or to suspend or revoke a license or otherwise take disciplinary action against a person who holds a license, upon the ground that the applicant or the licensee has been convicted of a crime substantially related to the qualifications, functions, and duties of the licensee in question, the record of conviction of the crime shall be conclusive evidence of the fact that the conviction occurred, but only of that fact, and the board

1 may inquire into the circumstances surrounding the commission of the crime in order  
2 to fix the degree of discipline or to determine if the conviction is substantially related  
to the qualifications, functions, and duties of the licensee in question.

3 As used in this section, "license" includes "certificate," "permit," "authority,"  
4 and "registration."

5 9. Section 2878 of the Code states:

6 The Board may suspend or revoke a license issued under this chapter [the  
7 Vocational Nursing Practice Act (Bus. & Prof. Code, 2840, et seq.)] for any of the  
following:

8 (a) Unprofessional conduct, which includes, but is not limited to, the  
9 following:

10 . . . .

11 (e) Making or giving any false statement or information in connection with the  
application for issuance of a license.

12 (f) Conviction of a crime substantially related to the qualifications, functions,  
13 and duties of a licensed vocational nurse, in which event the record of the conviction  
shall be conclusive evidence of the conviction.

14 . . . .

15 (j) The commission of any act involving dishonesty, when that action is related  
16 to the duties and functions of the licensee. . . .

17 10. Section 2878.5 of the Code states:

18 In addition to other acts constituting unprofessional conduct within the meaning  
19 of this chapter [the Vocational Nursing Practice Act] it is unprofessional conduct for  
a person licensed under this chapter to do any of the following:

20 . . . .

21 (b) Use any controlled substance as defined in Division 10 of the Health and  
22 Safety Code, or any dangerous drug as defined in Section 4022, or alcoholic  
beverages, to an extent or in a manner dangerous or injurious to himself or herself,  
23 any other person, or the public, or to the extent that the use impairs his or her ability  
to conduct with safety to the public the practice authorized by his or her license.

24 (c) Be convicted of a criminal offense involving possession of any narcotic or  
25 dangerous drug, or the prescription, consumption, or self-administration of any of the  
substances described in subdivisions (a) and (b) of this section, in which event the  
26 record of the conviction is conclusive evidence thereof. . . .

27 ///

28 ///



## REGULATORY PROVISIONS

11. California Code of Regulations, title 16, section 2521, states:

For the purposes of denial, suspension, or revocation of a license pursuant to Division 1.5 (commencing with Section 475) of the Business and Professions Code, a crime or act shall be considered to be substantially related to the qualifications, functions or duties of a licensed vocational nurse if to a substantial degree it evidences present or potential unfitness of a licensed vocational nurse to perform the functions authorized by his license in a manner consistent with the public health, safety, or welfare. Such crimes or acts shall include but not be limited to those involving the following:

(a) Procuring a license by fraud, misrepresentation, or mistake.

(b) A conviction of practicing medicine without a license in violation of Chapter 5 of Division 2 of the Business and Professions Code.

(c) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the violation of, or conspiring to violate any provision or term of Chapter 6.5, Division 2 of the Business and Professions Code.

(d) Aiding or assisting, or agreeing to aid or assist any person or persons, whether a licensed physician or not, in the performance of or arranging for a violation of any of the provisions of Article 13, Chapter 5, Division 2 of the Business and Professions Code.

(e) Conviction of a crime involving fiscal dishonesty.

(f) Any crime or act involving the sale, gift, administration, or furnishing of "narcotics or dangerous drugs or dangerous devices" as defined in Section 4022 of the Business and Professions Code.

12. California Code of Regulations, Title 16, section 2522 states:

When considering a) the denial of a license under Section 480 of the Business and Professions Code, b) the suspension or revocation of a license on the ground that a licensee has been convicted of a crime, or c) a petition for reinstatement of a license under Section 2787.7 of the Business and Professions Code, the Board in evaluating the rehabilitation of an individual and his or her present eligibility for a license, will consider the following criteria:

(1) Nature and severity of the act(s), offense(s), or crime(s) under consideration.

(2) Actual or potential harm to the public.

(3) Actual or potential harm to any patient.

(4) Overall disciplinary record.

(5) Overall criminal actions taken by any federal, state or local agency or court.

(6) Prior warnings on record or prior remediation.

(7) Number and/or variety of current violations.

1 (8) Mitigation evidence.

2 (9) In case of a criminal conviction, compliance with terms of sentence and/or  
3 court-ordered probation.

4 (10) Time passed since the act(s) or offense(s) occurred.

5 (11) If applicable, evidence of proceedings to dismiss a conviction pursuant to  
6 Penal Code section 1203.4.

7 (12) Cooperation with the Board and other law enforcement or regulatory  
8 agencies.

9 (13) Other rehabilitation evidence.

### 10 COST RECOVERY

11 13. Section 125.3 of the Code provides, in pertinent part, that the Board may request the  
12 administrative law judge to direct a licensee found to have committed a violation or violations of  
13 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
14 enforcement of the case.

### 15 FIRST CAUSE FOR DISCIPLINE

16 (August 22, 2007 Criminal Conviction for Driving Under the Influence on July 1, 2005)

17 14. Respondent has subjected her license to disciplinary action under sections 490 and  
18 2878, subdivision (f) of the Code in that Respondent was convicted of crimes that are  
19 substantially related to the qualifications, functions, and duties of a licensed vocational nurse.  
20 The circumstances are as follows:

21 a. Following two failures to appear and two bench warrants issued for  
22 Respondent's arrest, on or about August 22, 2007, in a criminal proceeding entitled *People of the*  
23 *State of California v. Francisca Rebecca Castro*, in Los Angeles County Superior Court, case  
24 number 5AL02991, Respondent was convicted on her plea of nolo contendere of violating  
25 Vehicle Code section 23152, subdivision (b), driving with a blood alcohol content (BAC) of 0.08  
26 percent or higher, a misdemeanor; and Vehicle Code section 14601.1, subdivision (a), driving on  
27 a revoked driver's license. An additional count of violating Vehicle Code section 23152,  
28 subdivision (a), driving under the influence of alcohol, was dismissed pursuant to a plea  
agreement.

1           b.     As a result of the convictions, on or about August 22, 2007, Respondent  
2 was ordered to serve six days in the county jail, and granted three years summary probation.  
3 Respondent was further ordered to complete a three-month First Offender Alcohol Program and a  
4 MADD victim impact panel, pay restitution in the amount of \$433, and comply with standard  
5 DUI probation terms. On November 8, 2007, the court issued another bench warrant for  
6 Respondent's arrest after she failed to abide by the probation terms. On March 11, 2008,  
7 Respondent was sentenced to 30 days in the county jail with credit for two days.

8           c.     The facts that led to the conviction are that on or about July 1, 2005, in Los  
9 Angeles County, the California Highway Patrol arrested Respondent for driving under the  
10 influence of alcohol with a revoked driver's license.

#### 11                               **SECOND CAUSE FOR DISCIPLINE**

##### 12                               **(Unprofessional Conduct – Use of Alcohol in a Dangerous Manner)**

13           15.    Respondent has subjected her license to disciplinary action under section 2878.5,  
14 subdivision (b) of the Code for unprofessional conduct in that on or about July 1, 2005,  
15 Respondent used alcohol in a manner dangerous or injurious to herself and others, in that she  
16 operated a motor vehicle on a public roadway while intoxicated as described in paragraph 14,  
17 above.

#### 18                               **THIRD CAUSE FOR DISCIPLINE**

##### 19                               **(Unprofessional Conduct - Criminal Convictions Involving the Consumption of Alcohol)**

20           16.    Respondent has subjected her license to disciplinary action under section 2878.5,  
21 subdivision (c) of the Code for unprofessional conduct in that on or about August 22, 2007,  
22 Respondent was convicted of an alcohol-related crime, as described in paragraph 14, above.

#### 23                               **FOURTH CAUSE FOR DISCIPLINE**

##### 24                               **(August 16, 2007 Criminal Conviction for Battery on October 16, 2006)**

25           17.    Respondent has subjected her license to disciplinary action under sections 490 and  
26 2878, subdivision (f) of the Code in that Respondent was convicted of a crime that is substantially  
27 related to the qualifications, functions, and duties of a licensed vocational nurse. The  
28 circumstances are as follows:

1 a. Following two failures to appear and two bench warrants issued for  
2 Respondent's arrest, on or about August 16, 2007, in a criminal proceeding entitled *People of the*  
3 *State of California v. Francisca Rebecca Castro*, in Los Angeles County Superior Court, case  
4 number 6EA10080, Respondent was convicted on her plea of nolo contendere of violating Penal  
5 Code section 242, battery, a misdemeanor. A second count of violating Penal Code section 368,  
6 subdivision (c), elder abuse, was dismissed pursuant to a plea agreement.

7 b. As a result of the conviction, on or about August 16, 2007, Respondent was  
8 granted 36 months summary probation, and ordered to pay fees, fines and restitution in the  
9 amount of \$1,079 or perform eight days of Cal Trans public work service. Respondent was  
10 further ordered to enroll in and attend 30 anger management classes, and to comply with the  
11 terms of her probation. On January 3, 2008, after Respondent's failure to abide by the terms of  
12 her probation, a bench warrant was issued and Respondent's probation was revoked. At a hearing  
13 on March 12, 2008, Respondent's probation was reinstated and she was ordered to spend eight  
14 days in the county jail. On May 12, 2008, Respondent's probation was again revoked. At a  
15 hearing on July 11, 2008, Respondent's probation was reinstated on the same terms and she  
16 received a suspended sentence of 120 days in the county jail. On August 4, 2008, Respondent's  
17 probation was again revoked for probation violations and a bench warrant was issued. At a  
18 hearing on September 8, 2008, Respondent was ordered to serve 120 days in the county jail with  
19 credit for nine days.

20 c. The facts that led to the conviction are that on or about the afternoon of  
21 October 16, 2006, the Montebello Police Department responded to the home of the victim,  
22 Respondent's 77-year-old disabled mother. Respondent, who sometimes stayed at her mother's  
23 house, became angry with her mother and shoved her to the floor, and kicked her in the arms.  
24 The victim was able to go to a next-door neighbor's house and call the police. Respondent was  
25 arrested for elder abuse. A police detective contacted the Elder Abuse Hotline and was informed  
26 that two previous reports had been received from a local hospital associated with the victim's  
27 name. The victim confirmed with the detective that her daughter had physically abused her in the  
28 past. According to the victim, Respondent abused drugs and alcohol and would become violent.

1 An Emergency Protective Order was issued, which later became a permanent protective order that  
2 was set to expire on August 15, 2010.

3 **FIFTH CAUSE FOR DISCIPLINE**

4 **(August 16, 2007 Criminal Conviction for Violating a Restraining Order on May 9, 2007)**

5 18. Respondent has subjected her license to disciplinary action under sections 490 and  
6 2878, subdivision (f) of the Code in that Respondent was convicted of a crime that is substantially  
7 related to the qualifications, functions, and duties of a licensed vocational nurse. The  
8 circumstances are as follows:

9 a. Following a failure to appear and a bench warrant issued for Respondent's  
10 arrest, on or about August 16, 2007, in a criminal proceeding entitled *People of the State of*  
11 *California v. Francisca Rebecca Castro*, in Los Angeles County Superior Court, case number  
12 7EA05853, Respondent was convicted on her plea of nolo contendere of violating Penal Code  
13 section 166, subdivision (a)(4), willful disobedience of a court order, a misdemeanor.

14 b. As a result of the conviction, on or about August 16, 2007, Respondent was  
15 granted 36 months summary probation, and ordered to perform 30 days of Cal Trans work  
16 service, pay \$229 in fees, fines and restitution, and comply with the terms of her probation. On  
17 September 27, 2007, Respondent's probation was revoked and a warrant issued for her arrest for  
18 failure to complete the Cal Trans work requirement. At a hearing on March 12, 2008,  
19 Respondent was sentenced to 60 days in the county jail, with credit for three days.

20 c. The facts that led to the conviction are that on or about the afternoon of  
21 May 8, 2007, Respondent called her mother (in violation of the restraining order described in  
22 paragraph 17, above), and asked her mother to remove the protective order. Respondent told her  
23 mother that her four children, who were in foster care, were in the process of being adopted and  
24 Respondent needed her mother's help to regain custody. The Montebello Police Department was  
25 contacted by Respondent's brother, but her mother refused to file a report when they responded to  
26 her residence. The next day, Respondent's mother went to the police department to file a report  
27 because she learned her daughter had fabricated the story about the adoption and she desired  
28 prosecution because she was fearful of her daughter.

1 SIXTH CAUSE FOR DISCIPLINE

2 (Making a False Statement of Fact Required to Be Revealed on Application)

3 19. Respondent has subjected her license to disciplinary action under section 2878,  
4 subdivisions (e) and (j), in that Respondent was dishonest when she made a false statement of fact  
5 required to be revealed in her renewal application to the Board as follows:

6 a. On or about May 6, 2010, Respondent signed her Application for  
7 Renewal of License certifying under penalty of perjury under the laws of the State of California  
8 that her answers in the application were true and correct.

9 b. Question 11 of the renewal application states:

10 SINCE YOUR LAST RENEWAL, HAVE YOU HAD ANY LICENSE  
11 DISCIPLINED BY A GOVERNMENT AGENCY OR BEEN CONVICTED OR  
12 PLED GUILTY TO ANY CRIME? A conviction must be reported regardless of  
13 whether it was an infraction, misdemeanor, or felony, except that you need not report  
14 a conviction for a traffic infraction if the fine was less than \$300 and the infraction  
15 did not involve alcohol or controlled substances. You must, however, disclose any  
16 conviction in which you entered a plea of no contest (nolo contendere) and any  
17 convictions that were subsequently set aside or dismissed pursuant to Sections 1000  
18 or 1203.4 of the Penal Code.

19 The application further stated that "False statements included in this application can  
20 result in discipline against your license up to and including revocation."

21 c. In response to Question 11, Respondent checked the box "No," failing to  
22 disclose her August 22, 2007, criminal conviction for driving under the influence (paragraph 14,  
23 above); her August 16, 2007, criminal conviction for battery (paragraph 17, above); and her  
24 August 16, 2007, criminal conviction for violating a restraining order (paragraph 18, above).

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27 ///

1 PRAYER

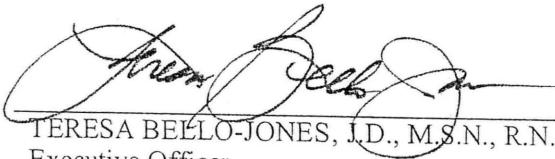
2 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
3 and that following the hearing, the Board of Vocational Nursing and Psychiatric Technicians  
4 issue a decision:

5 1. Revoking or suspending Vocational Nurse License Number VN 123517, issued to  
6 Francisca Castro;

7 2. Ordering Francisca Castro to pay the Board of Vocational Nursing and Psychiatric  
8 Technicians the reasonable costs of the investigation and enforcement of this case, pursuant to  
9 Business and Professions Code section 125.3;

10 3. Taking such other and further action as deemed necessary and proper.

11  
12 DATED: April 8, 2011

  
TERESA BEELO-JONES, J.D., M.S.N., R.N.  
Executive Officer  
Board of Vocational Nursing and Psychiatric Technicians  
Department of Consumer Affairs  
State of California  
Complainant

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